

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of

Second Periodic Review of the
Commission's Rules and Policies
Affecting the Conversion To
Digital Television

MB Docket N. 03-15

REPLY COMMENTS OF VINCENT D. MCBRIDE

In the Public Interest and the need for recovering the analog broadcast spectrum as quickly as possible, Vincent D. McBride ("McBride") hereby respectfully submits these reply comments in response to the FCC's Notice of Proposed Rule Making in the above-captioned proceeding.¹

RESOLUTION TO DTV TRANSITION

THE COMMISSION SHOULD REQUIRE STATIONS WITH OUT-OF-CORE CHANNELS IN THE LOWER AND UPPER 700 MHz SPECTRUM BAND TO OPERATE THEIR CURRENT ANALOG FACILITIES DURING THE TRANSITION, ON THEIR FREE DIGITAL IN-CORE CHANNEL ALLOTMENTS.

¹ Second Periodic Review of the Commission's Rules and Policies Affecting the Conversion To Digital Television, 18 FCC Rcd 1279, (rel. Jan. 27, 2003) [*hereinafter* etworks and other commercial applications.

The Commission will encourage band-clearing by requiring stations with analog channels and digital allotments to surrender their analog spectrum in the out-of-core channels and provide single-channel analog service on their free digital core channels during the transition. These stations then should be permitted to broadcast in analog or digital at their discretion during the DTV transition required by the Commission. This would further the goals of allowing the introduction of new wireless and public safety services in the 700 MHz band.

CONCLUSION

The Commission must consider the above and other alternatives, however reclamation of the out-of-core channels in the lower and upper 700MHz. band should remain at the forefront of these proceedings. If actions are not taken to clear the out-of-core channels, in the 700MHz.spectrum band then it is imperative that the FCC adopt and hold fast to early construction, channel deadlines and reclaim digital allotments of stations that do not comply and effectively participate in the DTV Transition. Spectrum is a national resource that is far too valuable to remain unused or underused indefinitely into the future.

Respectfully,

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